

BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

910 Franklin Avenue
Suite 200
Garden City, NY 11530
Tel. No. 516.248.5550
Fax No. 516.248.6027

Memo Endorsed

December 18, 2019

Via ECF

The Honorable Ona T. Wang
United States Magistrate Judge for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Shillingford v. Astra Home Care, Inc., et al.*
Case No.: 16-cv-06785 (KPF) (OTW)

Application Granted.

SO ORDERED.



Ona T. Wang 12/18/2019
U.S. Magistrate Judge

Dear Judge Wang:

As the Court knows, Borrelli & Associates, P.L.L.C. (“the Firm”) represents opt-in Plaintiff Erica Jacob Spencer in the above-referenced matter filed under, *inter alia*, the Fair Labor Standards Act. As the Court further knows, at the conference held on November 21, 2019, the Court stayed the Firm’s motion to withdraw as Spencer’s counsel, and ordered Defendants to file a *Cheeks* motion and the Firm to file a fee application by December 20, 2019. We now write, on behalf of all parties, to respectfully request an extension to file those documents until January 3, 2020, because the parties are still working to finalize the settlement agreement and need additional time to do so and for the parties to then execute and notarize it. This is the first request for an extension of time to file the settlement documents as it pertains to the resolution of claims between Ms. Spencer and Defendants.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/S/Kenneth F. St. John, Esq.

Kenneth F. St. John, Esq.

For the Firm

C: All Counsel of Record *via* ECF